

STANDARDIZED WORKPAPERS

OVERVIEW

Workpapers provide a written record of the examiner's decisions and analysis of violations, comments, and conclusions cited in the Report of Examination. They document examination procedures performed, compliance violations, and identified program weaknesses. Workpapers provide support for assertions or comments referenced in the Report of Examination.

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GENERAL WORKPAPER PROCEDURES

General Procedures
<p>1. Label workpapers with the following:</p> <ul style="list-style-type: none"> • Name of financial institution • Certificate number of financial institution • Location of branch/office • Date of examination • Name of Examiner-in-Charge • Name of the examiner/assistant examiner who completed the workpaper
<p>2. Complete appropriate workpapers and attach supporting documentation as required by established workpaper standards.</p>
<p>3. Prepare an Examiner Summary for each regulation reviewed or other task performed.</p> <p>Include:</p> <ul style="list-style-type: none"> • A brief statement indicating the scope of the review, indicating the time period or documents reviewed, as applicable • Examiner's conclusion(s) for that assignment/task including any violations and deficiencies noted during the examination that are not contained in the ROE <p>Write summary under a heading "Examiner Summary" at the bottom of the workpaper, or complete on a separate page entitled "Examiner Summary" and attach to the applicable workpaper.</p> <p>The Examiner Summary will allow any subsequent reader to clearly identify the scope of work performed and the basis for the examiner's conclusion.</p>
<p>4. Include the <u>Compliance Examination Hours</u> workpaper in the workpapers for each examination to:</p> <ul style="list-style-type: none"> • Provide accountability • Track examination hours • Reconcile hours to the data entry form
<p>5. Financial institutions do not receive copies of the examination workpapers. If an institution requests a copy of the examiner's workpapers, delete sensitive information not specifically derived from the institution's files or records before providing the workpapers to the financial institution.</p>

GENERAL WORKPAPER PROCEDURES (cont'd)

General Procedures
6. If the workpapers are revised in any manner after completion of the examination, such revisions should be clearly documented on the workpaper.

WORKPAPER REQUIREMENTS

Workpaper Requirements
1. Document procedures and findings at each examination.
2. Document procedures or complete workpapers for the review of: <ul style="list-style-type: none"> • Compliance policies and procedures • Loan- and deposit-related activities, as applicable <p>The use of standardized workpapers is optional. Documentation should contain sufficient information to enable an examiner having no previous connection with the examination to ascertain from them the evidence that supports the examiner's significant conclusions, judgements, and cited violations.</p>
3. Document violations clearly for easy reference and review and attach supporting documentation.
4. Insert additional information necessary to support examination findings.
<i>NOTE: Workpapers which thoroughly and accurately document the criticisms and weaknesses of a financial institution are necessary to support any subsequent enforcement action or possible appeals of material supervisory determinations.</i>

EXAMINER CHECKLISTS

Complete examiner checklists, if desired. The examiner checklists, provided in this manual for many compliance examination areas, are optional which the examiner may complete or use merely as a guide.

**DOCUMENTATION
OF VIOLATIONS**

Document Violations
1. Document violations appropriately.
2. Assemble copies of the financial institution's records to substantiate violations.
<p>3. Attach to the relevant workpapers the documentation for each violation cited in the Report of Examination.</p> <p>For example:</p> <ul style="list-style-type: none"> • Copies of notes and related disclosure statements for apparent violations of Regulation Z, Truth in Lending • Copies of adverse action notifications for apparent violations of Fair Credit Reporting Act and/or Regulation B, Equal Credit Opportunity • Copies of completed Hold Notices where the bank did not make \$100.00 available at the start of the next business day in violation of Regulation CC, Expedited Funds Availability <p><i>NOTE: For any apparent violations cited as systemic or a pattern or practice, the examiner need only attach copies of workpapers which represent the sample that supports this conclusion.</i></p>
<p>4. To cite a pattern or practice of reimbursable Truth in Lending violations, fully document the basis for the violations, supplying documentation which provides evidence of the:</p> <ul style="list-style-type: none"> • Cause of the violations • Branch(s)/office(s) affected • Time period of the violations • Type and volume of loans affected • Apparent frequency of the violations
<p>5. Obtain copies of loan disclosure statements illustrating the violations.</p> <p>Document statements, explanations or admissions by officers or other personnel involved or familiar with the financial institution's Truth in Lending disclosure practices.</p>

**FILING
WORKPAPERS**

Workpapers should be filed as follows.

File Workpapers
<p>1. Segregate workpapers by either regulation or examination procedures performed, for example, "Truth in Savings" or "Loan File Review." File workpapers generated for compliance program review and audit together under one heading or separately under the regulation reviewed.</p>
<p>2. Label overall workpaper box, folder, envelope, or binder appropriately with the following:</p> <ul style="list-style-type: none"> • Name and location of financial institution • Certificate number of financial institution • Date of examination • List of the workpapers prepared and retained
<p>3. Organize the workpaper boxes, folders, envelopes or binders in an expandable file or other appropriate centralized filing system. Promptly return examination workpapers to the field office or other designated place for storage at the conclusion of the examination.</p>
<p><i>NOTE: The Examiner-in-Charge is ultimately responsible for the completeness and accuracy of both the Report of Examination and the supporting workpapers.</i></p>
<p>4. As part of that responsibility, the Examiner-in-Charge shall do the following:</p> <ul style="list-style-type: none"> • Review workpapers for accuracy and completeness • Determine that appropriate bank documentation, where applicable, has been attached and retained in the workpapers • Confirm that workpapers are appropriately organized and filed

**RETENTION OF
WORKPAPERS**

Retain workpapers for a period of at least two years or until the next examination, whichever is later. Retain workpapers for longer periods in the following instances until corrective action (or some other resolution) has been completed:

- Regulation Z violations requiring reimbursement
- Fair lending violations resulting in referrals to the Department of Justice or Department of Housing and Urban Development
- Any type of enforcement action that has been placed on or remains outstanding against the financial institution
- A criminal referral has been made regarding the institution or any of its directors, trustees, management, or employees

The examples cited above are not all inclusive. Regional Directors and Field Office Supervisors have the discretion to require the retention of documents and workpapers in other situations.



**FDIC LAW,
REGULATIONS,
& RELATED
ACTS**

Applicable Rules

None

Advisory Opinions

None

**Statements of
Policy**

None

**DCA
MEMORANDA**

None

**FINANCIAL
INSTITUTION
LETTERS (FIL)**

None

TRUTH IN LENDING LOAN WORKSHEET		
Name:	Loan Type:	
Property Address:	Loan Amount:	
	Loan Number:	
Census Tract:	Loan Date:	
Loan Purpose:	App. Date	
Collateral:	Loan Officer	

	YES/NO/NA		Disclosed	Calculated
TIL Disclosure:		APR		
TIL Re-Disclosure:		Finance Charge		
Itemization of Amount Financed		Amount Financed		
		Interest Rate		
Pre-paid Finance Charges:		Loan Terms:		
Written Application:				
Regulation AA		PCCD		

FAIR LENDING (Non-Real Estate Loans Only)		
Surrogate Identifier:		Interest Rate:
Guarantor/Co-borrower Required? Y or N		Loan Term:
Credit life/disability sold? Y or N Required? Y or N		Loan Fees:
Loan-to-Value:	Loan-to-Price:	
Monthly Income:		
Monthly Debt-to-Income Ratio:		
Violations:		
Comments:		

Bank:		Exam Date:	
Cert.#:		EIC:	
Branch:		Prepared By:	

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TRUTH IN LENDING LOAN WORKSHEET INSTRUCTIONS

One worksheet should be completed for each loan file reviewed. This includes installment loan files and real estate loan files. Any area found to be in violation should be described in the "VIOLATIONS" section of worksheet and highlighted or marked in red. The examiner should also make copies of any documents found to have violations and attach them to the worksheet.

- | | |
|---|--|
| 1. Enter name of borrower | 7. Enter loan date |
| 2. Enter loan type (for example, Installment, Time, Demand) | 8. Enter loan purpose (for example, Purchase car, Purchase home, Home refinance, Construction, etc.) |
| 3. Enter loan amount | 9. Enter application date |
| 4. Enter borrower's property address | 10. Enter collateral (for example, Car, Real Estate, Unsecured, etc.) |
| 5. Enter loan number | 11. Enter loan officer's name, number, or initials. |
| 6. Enter census tract | |

Answer the following (YES/NO/NA):

12. Does the Truth in Lending (TIL) disclosure meet all regulatory requirements?
13. Does the TIL re-disclosure meet all regulatory requirements?
14. Is the Itemization of Amount Financed properly calculated and completed?

Enter the following information.

15. Enter the disclosed Annual Percentage Rate (APR) from the TIL disclosures.
16. Enter the calculated APR from the Office of Comptroller (OCC) APR computer program.
17. Enter the disclosed Finance Charge from the TIL disclosures.
18. Enter the calculated Finance Charge from the OCC's APR computer program.
19. Enter the Interest rate from the Contract Note.
20. Enter those prepaid finance charges examiners will need to complete other worksheets. (For example, points, disbursement fees, etc.)
21. Enter loan terms (for example, Number, Amount, and Timing of Payments).
22. Was a written application completed and was all required information obtained? (YES/NO/NA)
23. Do contracts and banking practices comply with Regulation AA, Credit Practices Rule requirements? (YES/NO/NA)
(NOTE: The examiner need only complete this entry for the portion of the sample being reviewed for this regulation.)
24. Do disclosures comply with Preservation of Consumer Claims and Defenses Act and contain a holder in Due Course Notice? (Dealer loans and referrals)(YES/NO/NA)
(NOTE: The examiner need only complete this entry for the portion of the sample being reviewed for this regulation.)

Fair Lending (Complete for Non-Real Estate Loans Only)

25. Enter surrogate identifier such as Race—Black, White, etc.; Age # of years; Sex—Male or Female or other prohibited basis.
26. Enter interest rate.
27. Indicate whether a guarantor or co-borrower was required.
28. Enter loan term (1, 3, 5 years).
29. Was credit life or disability insurance sold in conjunction with this note? If yes, was the insurance required?
30. Itemize all loan fees.
31. Enter the loan-to-value ratio.
32. Enter the loan-to-price ratio.
33. Enter the Applicant's Monthly Income.
34. Enter the Applicant's Monthly Debt-to-Income Ratio.

Comments:

This area is provided for the examiner to comment on any issues identified during the loan file review. In addition, other areas of the regulations the examiner wishes to track may be noted in this space (for example, Pre-pays, and all other matters the examiner wishes to monitor or document).

Violations:

The examiner should detail all violations identified during the loan file review. This will include violations on other attached loan sheets in areas such as RESPA, ECOA, Fair Housing, etc.

- | | |
|---|---|
| 35. Enter financial institution's name. | 38. Enter name of Examiner-in-Charge. |
| 36. Enter examination date. | 39. Enter branch location. |
| 37. Enter certificate number. | 40. Enter the name of the examiner who performed the file review. |

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REAL ESTATE LOAN WORKSHEET					
(Purchase/Refinance/Permanent Construction/Assumption)					
Name:				Loan Number:	
TRUTH IN LENDING					
		YES/NO/NA		YES/NO/NA	
Rescission Notice Provided & Date				CHARM Booklet Provided	
Funds Disbursed after 3 day Rec. Period				ARM Program Disclosures	
Assumption Notice Provided				Sub. ARM Disc. Provided	
REAL ESTATE SETTLEMENT PROCEDURES					
		YES/NO/NA		YES/NO/NA	
MSDS				Transfer Notice	
SIB				Initial Escrow	
GFE				Annual Escrow	
HUD 1/1A				GFE Comparable to HUD 1/1A	
FLOOD INSURANCE					
		YES/NO/NA		YES/NO/NA	
Standard Flood Determination Form				Flood Notice to Borrower & Servicer	
Determination Fee				Acknowledgment of Borrower and Servicer	
Flood Insurance Required					
Flood Escrow				Notice of Servicer to FEMA	
Current Policy				Amount of Insurance Sufficient	
FAIR HOUSING/ECOA			FAIR LENDING		
Monitoring Information				Loan Amount Requested	Loan Amount Granted
Additional Info				Loan-to-Value	Loan-to-Price
Appraisal Notice				Monthly Debt-to-Income Ratio	Housing Pmt-to-Income Ratio
	Applicant	Co-Applicant	Monthly Income		
Race			HMDA		
Sex			HMDA Data Collected		
Age			LAR		
Mar Stat					
Bank				Exam Date	

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REAL ESTATE LOAN WORKSHEET INSTRUCTIONS
(Purchase/Refinance/Permanent Construction/Assumption)

1. Enter borrower's name.
2. Enter loan number.

Truth in Lending, Regulation Z – Answer the following (YES/NO/NA)

3. Was the correct rescission notice provided? (YES/NO/NA) Include Date.
4. Were funds disbursed after the 3 day rescission period? (YES/NO/NA)
5. Was the assumption notice provided?
6. Was the Consumer Handbook For Adjustable Rate Mortgages (CHARM) provided as required by Regulation Z, Truth in Lending?
7. Were the Adjustable Rate Mortgage (ARM) disclosures provided, as required by Regulation Z, and did the disclosures include all required information?
8. Were all subsequent ARM disclosures provided as required?

Real Estate Settlement Procedures, Regulation X – Answer the following (YES/NO/NA)

9. Was the Mortgage Servicing Disclosure Statement (MSDS) provided as required by Regulation X, Real Estate Settlement Procedures? (Required only on first liens.)
10. Was the Special Information Booklet (SIB) provided?
11. Was the Good Faith Estimate (GFE) properly completed and provided as required by Regulation X?
12. Was the HUD1/1A prepared correctly and available for review as required by Regulation X?
13. Was the Mortgage Servicing Transfer Notice (Transfer Notice) provided as required and did it meet all regulatory requirements? (Required only on first liens.)
14. Were the initial and annual escrow statements provided as required and did they meet all regulatory requirements?
15. Was the GFE comparable to the HUD1/1A?

Flood Insurance – Answer the following (YES/NO/NA)

16. Was the Standard Flood Determination Form properly completed?
17. Was the Flood Notice provided to the borrower and servicer as required and did it meet all regulatory requirements?
18. Was a fee charged for flood determinations? If yes, was the fee for determination reasonable? (*NOTE: If fee includes life of loan monitoring charge, then that portion is a finance charge.*)
19. Did the bank retain evidence that the flood notice was received by the borrower and servicer?
20. Is flood insurance required?
21. Is a flood escrow required and was it established? (*NOTE: If loan is subject to RESPA, escrows must comply with Section 3500.17.*)
22. Was a written notice sent to the Director (or designee) of the Federal Emergency Management Agency (FEMA) regarding the name of the servicer of any loan located in a special flood hazard area, or when there was a change in the servicer?
23. Is the flood insurance policy current?
24. Is the amount of flood insurance sufficient?

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Real Estate Loan Worksheet Instructions (continued)Fair Housing (Part 338) /Equal Credit Opportunity Act (ECOA)

25. Was monitoring information collected? (YES/NO/NA)
26. Was additional ECOA information for home loan applications collected? (YES/NO/NA)
27. Was the Appraisal Notice availability statement provided? (YES/NO/NA)
28. Enter the Race of the applicant.
29. Enter the Sex of the applicant.
30. Enter the Age of the applicant.
31. Enter the Marital Status (Mar Stat) of the applicant.
32. Enter the Race of the co-applicant.
33. Enter the Sex of the co-applicant.
34. Enter the Age of the co-applicant.
35. Enter the Marital Status (Mar Stat) of the co-applicant.

Fair Lending

36. Enter the loan amount requested.
37. Enter the loan amount granted.
38. Enter then loan-to-value ratio.
39. Enter the loan-to-price ratio.
40. Enter the monthly debt-to-income ratio.
41. Enter the housing payment-to-income ratio.
42. Enter monthly income. (Either gross or net. Be consistent.)

Home Mortgage Disclosure Act (HMDA)

43. Was HMDA data collected? (YES/NO/NA)
44. LAR – Was information transferred to the LAR correctly and within the 30 day requirement? (YES/NO/NA)
45. Enter financial institution's name.
46. Enter examination date.

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REAL ESTATE LOAN WORKSHEET					
(Interim Construction)					
Name:				Loan Number:	
FLOOD INSURANCE					
	YES/NO/NA			YES/NO/NA	
Standard Flood Determination Form			Flood Notice to Borrower and Servicer		
Determination Fee			Acknowledgment of Borrower and Servicer		
Flood Insurance Required					
Flood Escrow			Notice of Servicer to FEMA		
Current Policy			Amount of Insurance Sufficient		
FAIR HOUSING/ECOA			FAIR LENDING		
Monitoring Information			Loan Amount Requested		Loan Amount Granted
Additional Info*			Loan-to-Value		Loan-to-Price
Appraisal Notice			Monthly Debt-to-Income Ratio		Housing Pmt-to-Income Ratio
	Applicant	Co-Applicant	Monthly Income		
Race			Comments:		
Sex					
Age					
Mar Stat					
Bank				Exam Date	

*Note: Reference Section 338.7(a)(2).

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REAL ESTATE LOAN WORKSHEET INSTRUCTIONS

(Interim Construction)

NOTE:

RESPA will be applicable to an interim construction loan:

- If the term of the loan is greater than two years, or
- There is an oral or implied commitment by the financial institution to finance the permanent loan

In these instances, use the "Purchase/Refinance/Permanent Construction/Assumption" Real Estate Loan Worksheet.

1. Enter borrower's name.
2. Enter loan number.

Flood Insurance - Answer the following (YES/NO/NA)

3. Was the Standard Flood Determination Form properly completed?
4. Was the Flood Notice provided to the borrower and servicer as required and did it meet all regulatory requirements?
5. Was a fee charged for flood determinations? If yes, was the fee for determination reasonable? (*NOTE: If fee includes life of loan monitoring charge, then that portion is a finance charge.*)
6. Did the bank retain evidence that the flood notice was received by the borrower and servicer?
7. Is flood insurance required?
8. Is a flood escrow required and was it established? (*NOTE: If loan is subject to RESPA, escrows must comply with Section 3500.17.*)
9. Was a written notice sent to the Director of FEMA (or designee) regarding the name of the servicer of any loan located in a special flood hazard area, or when there was a change in the servicer?
10. Is the flood insurance policy current?
11. Is the amount of flood insurance sufficient?

Fair Housing, Part 338/ECOA

12. Was monitoring information collected? (YES/NO/NA)
13. Was additional ECOA information for home loan applications collected? (YES/NO/NA)
14. Was the Appraisal Notice availability statement provided? (YES/NO/NA)
15. Enter the Race of the applicant.
16. Enter the Sex of the applicant.
17. Enter the Age of the applicant.
18. Enter the Marital Status (Mar Stat) of the applicant.
19. Enter the Race of the co-applicant.
20. Enter the Sex of the co-applicant.
21. Enter the Age of the co-applicant.
22. Enter the Marital Status (Mar Stat) of the co-applicant.

Fair Lending

23. Enter the loan amount requested.
24. Enter the loan amount granted.
25. Enter then loan-to-value ratio.
26. Enter the loan-to-price ratio.
27. Enter the monthly debt-to-income ratio.
28. Enter the housing payment-to-income ratio.
29. Enter monthly income. (Either gross or net. Be consistent.)

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REAL ESTATE LOAN WORKSHEET					
(Home Improvement/Closed-End Home Equity)					
Name		Loan Number			
TRUTH IN LENDING					
		YES/NO/NA			YES/NO/NA
Rescission Notice Provided & Date			CHARM Booklet Provided		
Funds Disbursed after 3 day Rec. Period			ARM Program Disclosures		
Assumption Notice Provided			Sub. ARM Disc. Provided		
REAL ESTATE SETTLEMENT PROCEDURES					
		YES/NO/NA			YES/NO/NA
MSDS			Transfer Notice		
GFE					
HUD 1/1A			GFE Comparable to HUD 1/1A		
FLOOD INSURANCE					
		YES/NO/NA			YES/NO/NA
Standard Flood Determination Form			Flood Notice to Borrower and Servicer		
Determination Fee			Acknowledgment of Borrower and Servicer		
Flood Insurance Required					
Flood Escrow			Notice of Servicer to FEMA		
Current Policy			Amount of Insurance Sufficient		
FAIR HOUSING/ECOA			FAIR LENDING		
Monitoring Information			Loan Amount Requested		Loan Amount Granted
Appraisal Notice			Loan-to-Value		Loan-to-Price
	Applicant	Co-Applicant	Monthly Debt-to-Income Ratio		Housing Pmt-to-Income Ratio
Race			Monthly Income		
Sex			HMDA		
Age			HMDA Data Collected		
Mar Stat			LAR		
Bank			Exam Date		

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REAL ESTATE LOAN WORKSHEET INSTRUCTIONS

(Home Improvement/Closed-End Home Equity)

1. Enter borrower's name.
2. Enter loan number.

Truth in Lending, Regulation Z - Answer the following (YES/NO/NA):

3. Was the correct rescission notice provided? (YES/NO/NA) Include Date.
4. Were funds disbursed after the 3 day rescission period? (YES/NO/NA)
5. Was the assumption notice provided?
6. Was the Consumer Handbook For Adjustable Rate Mortgages (CHARM) provided as required by Regulation Z?
7. Were the Adjustable Rate Mortgage (ARM) disclosures provided as required by Regulation Z and did the disclosure include all required information?
8. Were all subsequent ARM disclosures provided as required?

Real Estate Settlement Procedures, Regulation X - Answer the following (YES/NO/NA):

9. Was the Mortgage Servicing Disclosure Statement (MSDS) provided as required by Regulation X? (Required only on first liens.)
10. Was the Good Faith Estimate (GFE) properly completed and provided as required by Regulation X?
11. Was the HUD1/1A prepared correctly and available for review as required by the regulation?
12. Was the Mortgage Servicing Transfer Notice (Transfer Notice) provided as required and did it meet all regulatory requirements? (Required only on first liens.)
13. Was the GFE comparable to the HUD1/1A?
14. The blank space after #12 above can be utilized to reflect any applicable RESPA disclosures such as escrow disclosures.

Flood Insurance - Answer the following (YES/NO/NA):

15. Was the Standard Flood Determination Form properly completed?
16. Was the Flood Notice provided to the borrower and servicer as required and did it meet all regulatory requirements?
17. Was a fee charged for flood determinations? If yes, was the fee for determination reasonable? (*NOTE: If fee includes life of loan monitoring charge, then that portion is a finance charge.*)
18. Did the bank retain evidence that the flood notice was received by the borrower and servicer?
19. Is flood insurance required?
20. Is a flood insurance escrow required and was it established? (*NOTE: If loan is subject to RESPA, escrows must comply with Section 3500.17.*)
21. Was a written notice sent to the Director of FEMA (or designee) regarding the name of the servicer of any loan located in a special flood hazard area, or when there was a change in the servicer?
22. Is the flood insurance policy current?
23. Is the amount of flood insurance sufficient?

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Real Estate Loan Worksheet Instructions (continued)

Fair Housing, Part 338/ECOA

24. Was monitoring information collected? (YES/NO/NA)
25. Was the Appraisal Notice availability statement provided? (YES/NO/NA)
26. Enter the Race of the applicant.
27. Enter the Sex of the applicant.
28. Enter the Age of the applicant.
29. Enter the Marital Status (Mar Stat) of the applicant.
30. Enter the Race of the co-applicant.
31. Enter the Sex of the co-applicant.
32. Enter the Age of the co-applicant.
33. Enter the Marital Status (Mar Stat) of the co-applicant. (1st Deed of Trusts only)

Fair Lending

34. Enter the loan amount requested.
35. Enter the loan amount granted.
36. Enter then loan-to-value ratio.
37. Enter the loan-to-price ratio.
38. Enter the monthly debt-to-income ratio.
39. Enter the housing payment-to-income ratio.
40. Enter monthly income. (Either gross or net. Be consistent.)

HMDA

41. Was HMDA data collected? (YES/NO/NA)
42. LAR - Was information transferred to the LAR correctly and within the 30 day requirement? (YES/NO/NA)
43. Enter financial institution's name.
44. Enter examination date.

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CREDIT CARDS				
Bank:		Prepared By:		
Cert. #:		EIC:		
Branch:		Exam Date:		
Bank is Credit Card Issuer and Creditor				
Credit Card Data		CC 1	CC 2	CC 3
Name				
Credit card #				
Date credit card issued				
Loan Officer				
Application date				
Credit card limit				
T I L A	TILA disclosures/application			
	TILA disclosures in a tabular format			
	Initial disclosures			
	Periodic statement			
	ID of transactions			
	Subsequent disclosures			
Bank is Credit Card Issuer, Not Creditor				
Credit Card Data		CC 1	CC 2	CC 3
Name				
Credit card #				
Application date				
T I L A	TILA disclosures & application			
	TILA disclosures in a tabular format			
COMMENTS & VIOLATIONS				

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WORKPAPER INSTRUCTIONS – CREDIT CARDS

General Instructions

1. Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."
2. Use the Comments and Violations Section:
 - For apparent violations (for example, subsequent disclosures were not provided, etc.)
 - Any issues requiring additional comments or review/follow-upClearly state violations. Highlight or mark in red for easy reference.

Financial Institution is Credit Card Issuer and Creditor

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completed the workpaper
2. Enter the following data:
 - a) Borrower's name
 - b) Credit card number
 - c) Date the credit card was issued
 - d) Loan officer's name or code
 - e) Application date
 - f) Credit card limit

Truth in Lending Act (TILA)

1. Were the disclosures provided on or with the solicitation or application for the card?
2. Were the disclosures in a tabular format or in a prominent location?
3. Indicate when the initial disclosures were provided (for example, before the first transaction, etc.)
4. Are periodic statements provided?
5. Are credit transactions identified on the statement?
6. Were subsequent disclosures provided?

Financial Institution is Credit Card Issuer, Not Creditor

1. Enter the following data:
 - a) Borrower's name
 - b) Credit card number
 - c) Application date

Truth in Lending Act (TILA)

1. Were the disclosures provided on or with the solicitation or application for the card?
2. Were the disclosures in a tabular format or in a prominent location?

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OPEN-END HOME EQUITY LINES OF CREDIT									
Bank:					Exam Date:				
Cert. #:					EIC:				
Loan Data		Loan 1		Loan 2		Loan 3		Loan 4	
Name									
Property Address									
Census Tract									
Loan number									
Loan date									
Loan officer									
Application date									
Purpose									
Loan amount									
T I L A	HE brochure								
	TILA disclosure								
	APR disc./calc.								
	FC disc./calc.								
	Right of rescission								
	Periodic stmt.								
	ID of Transaction								
	Subs. disc.								
F I	Standard Flood Determination Form								
	Flood Notice to Borrower								
	Flood Notice to Servicer								
	Determination Fee								
	Acknowledgment of Borrower and Servicer								
	Flood Insurance Required								
	Flood Escrow								
	Current Policy								
	Amount of Ins. sufficient								

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OPEN-END HOME EQUITY LINES OF CREDIT (Continued)									
R E S P A	GFE Provided								
	HMDA Data Collected								
	Is LAR Entry Accurate								
	Monitoring Info.								
F A I R H O U S I N G / E C O A	Additional Info.								
	Appraisal Notice								
		App	Co-App	App	Co-App	App	Co-App	App	Co-App
	Race								
	Sex								
	Age								
	Marital Status								
	Loan Amount Requested								
	Loan Amount Granted								
	Loan-to-Value								
L E N D I N G	Loan-to-Price								
	Monthly Debt-to-Income Ratio								
	Housing Payment to Income Ratio								
	Monthly Income								

COMMENTS & VIOLATIONS

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WORKPAPER INSTRUCTIONS

OPEN-END HOME EQUITY LINES OF CREDIT

General Instructions

Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."

Use the Comments and Violations Section:

- For apparent violations (for example, subsequent disclosures were not provided, etc.)
- Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

1. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-charge
- Name of the individual who actually completed the workpaper

2. Enter the following data:

- a) Borrower's name
- b) Borrower's address
- c) Borrower's census tract
- d) Loan number
- e) Loan date
- f) Loan officer's name or code
- g) Application date
- h) Purpose of the loan
- i) Loan amount or amount financed

Truth in Lending Act (TILA)

1. Was the home equity (HE) "Your home is on the line brochure" provided at the time of application?
2. Indicate when the TILA disclosures were provided (date or number of business days).
3. Enter the annual percentage rate (APR) disclosed and calculated by the examiner.
4. Enter the finance charge (FC) disclosed and calculated by the examiner.
5. Was the right of rescission provided?
6. Was a periodic statement provided?
7. Did the periodic statement identify the credit transactions?
8. Was the subsequent disclosure provided?

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Open-End Home Equity Lines of Credit Worksheet Instructions (continued)

Flood Insurance

1. Was the Standard Flood Determination Form properly completed?
2. Was the Flood Notice provided to the borrower and servicer as required and did it meet all regulatory requirements?
3. Was a fee charged for flood determinations? If yes, was the fee for determination reasonable? (*NOTE: If fee includes life of loan monitoring charge, then that portion is a finance charge.*)
4. Did the bank retain evidence that the flood notice was received by the borrower and servicer?
5. Is flood insurance required?
6. Was a written notice sent to the Director of FEMA (or designee) regarding the name of the servicer of any loan located in a special flood hazard area, or when there was a change in the servicer?
7. Is flood escrow required and was it established? (*NOTE: If loan is subject to RESPA, escrows must comply with Section 3500.17.*)
8. Is the flood policy current?
9. Is the amount of flood insurance sufficient?

Real Estate Settlement Procedures, Regulation X

1. When was the good faith estimate (GFE) provided (date or number of business days)?

HMDA

1. If the institution chooses to record home equity lines of credit, was the data collected for entry on the LAR?
2. LAR – Was information transferred to the LAR correctly and within the 30 day requirement? (YES/NO/NA)

Fair Housing, Part 338/ECOA

1. Was monitoring information collected? (YES/NO/NA)
2. Was additional ECOA information for home loan applications collected? (YES/NO/NA)
3. Was the Appraisal Notice Availability Statement provided? (YES/NO/NA)
4. Enter the Race of the applicant.
5. Enter the Sex of the applicant.
6. Enter the Age of the applicant.
7. Enter the Marital Status of the applicant.
8. Enter the Race of the co-applicant.
9. Enter the Sex of the co-applicant.
10. Enter the Age of the co-applicant.
11. Enter the Marital Status of the co-applicant.

Fair Lending

1. Enter the loan amount requested.
2. Enter the loan amount granted.
3. Enter the loan-to-value ratio.
4. Enter the loan-to-price ratio.
5. Enter the monthly debt-to-income ratio.
6. Enter the housing payment-to-income ratio.
7. Enter monthly income (Either gross or net. Be consistent.)

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OTHER OPEN-END CREDIT					
Bank:		Exam Date:			
Cert. #:		EIC:			
Branch:		Prepared By:			
Credit Data		1	2	3	4
Name					
Acct. number					
Acct. date					
Loan Officer					
Application date					
Credit product					
Credit limit					
T I L A	Initial disclosures				
	Periodic statement				
	ID of transactions				
	Subsequent disclosures				

COMMENTS & VIOLATIONS

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WORKPAPER INSTRUCTIONS

OTHER OPEN-END CREDIT

General Instructions

Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."

Use the Comments and Violations Section:

- For apparent violations (for example, subsequent disclosures were not provided, etc.)
- Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

1. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-Charge
- Name of the individual who actually completes the workpaper

2. Enter the following data:

- a) Borrower's name
- b) Account number
- c) Account date
- d) Loan officer's name or code
- e) Application date
- f) Credit product (for example, overdraft protection, etc.)
- g) Credit limit

Truth in Lending Act (TILA)

1. Were the disclosures provided on or with the solicitation or application for credit?
If so, indicate when the initial disclosures were provided (for example, before the first transaction, etc.)
2. Are periodic statements provided?
3. Are credit transactions identified on the statement?
4. Were the subsequent disclosures provided?

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LOAN APPLICATIONS NOT ORIGINATED (Consumer and Real Estate Loans)				
Bank:		Exam Date:		
Cert. #:		EIC:		
Branch:		Prepared By:		
Applicants				
Address				
Census Tract				
Purpose				
Collateral				
Amount Requested				
Application Date				
Action Date				
Type of Action				
Loan Officer				
Additional Info				
Reasons for Action				
Valid/Supported?				
F C R	Credit Report (CR)			
	CR used in decision/disclosed			
	Name & Address of CB provided			
	Third party info used/disclosed			

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WORKPAPER COMPLETION INSTRUCTIONS**LOAN APPLICATIONS NOT ORIGINATED**
(Consumer and Real Estate Loans)General Instructions:

Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."

Use the Comments and Violations Section:

- For apparent violations (for example, subsequent disclosures were not provided, etc.)
- Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

Specific Loan Applications Not Workpaper Instructions

Use the first page of this workpaper to document a review of all loan requests that did not result in originations. There are two "second workpaper pages," the use of which will vary depending on the type of loan request under review. Certain unsecured commercial loan and consumer loan requests are not subject to certain regulations, such as HMDA, RESPA, and Fair Housing. Loans secured by real estate, such as purchase money mortgages, refinancing, home improvement/equities, and certain commercial loans, where the requirements of ECOA, Fair Housing, Truth in Lending, RESPA, and HMDA may apply, require a more extensive review.

Consumer and Real Estate Loans

1. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-Charge
- Name of the individual who actually completed the workpaper

2. Enter the following data, if available:

- a) Applicant(s) name
- b) Applicant(s) address
- c) Census tract or block numbering area (BNA)
- d) Purpose of the loan request (purchase, refinancing, construction, commercial)
- e) Collateral
- f) Amount requested
- g) Application date
- h) Date the application was acted upon
- i) Type of action (denial, withdrawal, approved but not accepted)
- j) Loan officer name or code
- k) Additional information, such as date of counteroffer, date that additional information to complete application was requested, etc.
- l) Briefly describe the primary reason(s) for the action taken

Fair Credit Reporting

1. Indicate with "YES" or "NO" if a credit report was ordered on the applicant(s)
2. If ordered, was the credit report used in the credit decision? If yes, was this fact disclosed to the applicant(s)?
3. Was the name and address of the credit bureau (CB) provided to the applicant(s)?
4. Was third party information used in the credit decision? If yes, was this fact disclosed?

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LOAN APPLICATIONS NOT ORIGINATED (Consumer Loans) Continued					
Bank:		Exam Date:			
Cert.#:		EIC:			
Branch:		Prepared By:			
E C O A	Spousal Info				
	Marital Status				
	Written Application				
	Application complete				
	Notified of decision within 30 days				
	Written action notice				

COMMENTS & VIOLATIONS

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WORKPAPER COMPLETION INSTRUCTIONS

LOAN APPLICATIONS NOT ORIGINATED

(Consumer Loans)

ECOA (Consumer Loan Workpaper)

1. Was spousal information on the applicant(s) requested only under the stipulations outlined in Regulation B? (Yes or No)
2. Was the marital status of the applicant(s) requested only under the stipulations outlined in Regulation B? (Yes or No)
3. Was a written application obtained? (YES or NO)
4. Was the application complete? (YES or NO)
5. Was the applicant(s) notified of the credit decision within 30 days? (YES or NO)
6. Was a written action notice provided with all the required information and disclosures? (YES or NO)

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LOAN APPLICATIONS NOT ORIGINATED (Real Estate Loans) Continued					
Bank:			Exam Date:		
Cert. #:			EIC:		
Branch:			Prepared By:		
E C O A / F H	Spousal Info				
	Marital Status				
	Written Application				
	Application complete				
	Notified of decision within 30 days				
	Written action notice				
	Appraisal notice				
	Monitoring info				
	Race of Applicant/ Co-applicant				
	Sex of Applicant/Co-applicant				
	Age of Applicant/Co-applicant				
Z & X	Applicable disclosures within 3 business days				
H M D A	Data Collected				
	LAR				

COMMENTS & VIOLATIONS

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WORKPAPER COMPLETION INSTRUCTIONS

LOAN APPLICATIONS NOT ORIGINATED

(Real Estate Loans)

ECOA/FH (Real Estate Loan Workpaper)

1. Was spousal information on the applicant(s) requested only under the stipulations outlined in Regulation B? (Yes or No)
2. Was the marital status of the applicant(s) requested only under the stipulations outlined in Regulation B? (Yes or No)
3. Was a written application obtained? (YES or NO)
4. Was the application complete? (YES or NO)
5. Was the applicant(s) notified of the credit decision within 30 days? (YES or NO)
6. Was a written action notice provided with all the required information and disclosures? (YES or NO)
7. Was the notice of the right to receive a copy of the appraisal provided? (YES or NO)
8. Was government monitoring information provided? (YES or NO)
9. Enter the Race of the applicant(s)?
10. Enter the Sex of the applicant(s)?
11. Enter the Age of the applicant(s)?

Regulation Z, Truth in Lending and Regulation X, Real Estate Settlement Procedures

NOTE: In many cases, the requirements of Regulations Z and X do not apply if the application is denied prior to the third business day.

1. Regulation Z – Were the required disclosures provided in an accurate and timely manner, including Consumer Handbook For Adjustable Rate Mortgages (CHARM) brochure, Adjustable Rate Mortgage (ARM) program disclosure, Truth in Lending disclosure?
2. Regulation X – Were the required disclosures provided in an accurate and timely manner, including the Special Information Booklet (SIB), Good Faith Estimate, and Mortgage Servicing Disclosure?

Home Mortgage Disclosure Act (HMDA), Regulation C

1. Was the data collected for entry on the LAR? (YES or NO)
2. Is the entry accurate? (YES or NO)

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FAIR DEBT COLLECTION PRACTICES				
Bank:		Exam date:		
Cert.#:		EIC:		
Branch:		Prepared by:		
Data	1	2	3	4
Debtor's name				
Creditor(s)				
Amount owed				
Method(s) of communicating with the debtor				
Amount collected				
Application of payment(s) received for debt(s)				

COMMENTS & VIOLATIONS

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WORKPAPER INSTRUCTIONS

FAIR DEBT COLLECTION PRACTICES

General Instructions:

Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."

Use the Comments and Violations Section:

- For apparent violations (for example, subsequent disclosures were not provided, etc.)
- Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

1. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-Charge
- Name of the individual who actually completed the workpaper

2. Enter the debtor's name.

3. Name the creditor(s) .

4. Enter the amount owed to each creditor.

5. State method(s) used to communicate with the debtors.

6. Enter the amount collected for each debt.

7. If multiple creditors are involved, indicate how the payments received were applied to the debts.

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CONSUMER LEASING					
Bank:		Exam date:			
Cert.#:		EIC:			
Branch:		Prepared by:			
Lease Data		Lease 1	Lease 2	Lease 3	Lease 4
Lessee					
Lease date					
Lease number					
Officer					
Application date					
Lease amount					
# of lessees					
# of lessors					
Lease-originated or purchased?					
Purchased from whom?					
R E G M	Initial disclosures				
	Disclosure format				
	Required disclosures				
	Additional information				
	Renegotiated or Extended Lease				
	Advertising disclosures				

COMMENTS & VIOLATIONS

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WORKPAPER INSTRUCTIONS

CONSUMER LEASING

General Instructions:

Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."

Use the Comments and Violations Section:

- For apparent violations (for example, subsequent disclosures were not provided, etc.)
- Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

1. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-Charge
- Name of the individual who actually completed the workpaper

2. Enter the following data:

- a) Lessee's name
- b) Lease date
- c) Lease number
- d) Officer's name or code
- e) Application date
- f) Lease amount
- g) Number of lessees
- h) Number of lessors

3. Was the lease originated by the financial institution or purchased?

4. If purchased, from whom?

Regulation M, Consumer Leasing:

1. Were the appropriate disclosures provided prior to consummation of the lease?
2. Enter the format of the disclosures: a) made together on the contract b) on another instrument evidencing the lease on the same page and above the place for the lessee's signature, or c) on a separate statement which identifies the lease transaction.
3. Were the required disclosures provided?
4. Was additional information provided in the lease?
5. Is the lease renegotiated or extended?
6. Have the lease(s) been advertised? If so, were the appropriate disclosures made?

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EXHIBIT 1

FDIC Compliance Examination Worksheet

Application Analysis Worksheet

Date:

Examiner:

Institution:

Location:

Cert. Number:

Loan Application Category:

Purchase:

Refinance:

Home Improvement:

Construction:

Number				Percent	Percent
Accepted	Rejected	Withdrawn	Total	Rejected	Withdrawn

Black

Hispanic

Other Minority

White

Total Percentages:

APPLICATIONS RECEIVED/COMMUNITY COMPOSITION

Applicants

In the Community

Black

Hispanic

Other Minority

White

Total

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FDIC Compliance Examination Workpaper

EXHIBIT 2

Mortgage Lending Decision Analysis Worksheet (MLDA)

Date:

Loan Type:

Number of Applicants:

Examiner:

Purchase:

Accepted:

Institution:

Refinance:

Rejected:

Location:

Home Improvement:

Cert. Number:

Construction:

				<u>Loan Amount</u>		<u>Loan To</u>		<u>Income Ratio</u>										
Date Action Taken	Applicant	Loan Officer	CT (N'hood)	Requested	Granted	Value	Price	Mo. debt	Hsg. Pmt	PMI Y/N	Mtg. dur (Mos)	Int. Rate	Points	Race	% Min. of CT	Sex M/F	Marital Status	Reasons for Rejection

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WORKPAPER INSTRUCTIONS

FAIR HOUSING

Application Analysis Worksheet and Mortgage Lending Decision Analysis Worksheet (MLDA)

Complete Exhibits 1 and 2 as outlined in the outstanding memorandum Revised Examination Procedures for Fair Housing, dated April 9, 1993, Transmittal 93-53.

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ELECTRONIC FUND TRANSFERS – INITIAL DISCLOSURE		
Bank:	Exam Date:	
Cert #:	EIC:	
Branch:	Prepared by:	
	YES	NO
(A) Are the disclosures provided to the consumer in writing as required under Section 205.4(a)?		
(B) Are the disclosures provided prior to the consumer contracting for service or before the first electronic fund transfer as required under Section 205.7(a)?		
(C) Are the disclosures provided such that the consumer may retain them as required under Section 205.4(a)?		
Regulation E - Section 205.7 Do the written disclosures contain:		
(1) Summary of consumer's liability under Section 205.6.		
(2) Telephone number or address for consumer to notify financial institution of unauthorized transfers.		
(3) Financial institution's business days as described under Section 205.2(d).		
(4) Types of transfers the consumer may make and the limitations on frequency.		
(5) Charges for electronic fund transfers, if applicable.		
(6) Summary of the consumer's right to receive documentation of electronic fund transfers as provided in Sections 205.9, 205.10(a), and 205.10(d).		
(7) Summary of consumer's right to stop payment of a preauthorized transfer and procedures for initiating a stop payment order. (Section 205.10(c))		
(8) Summary of the financial institution's liability to the consumer for its failure to make or to stop certain transfers under Section 910 of the Act.		
(9) Circumstances under which the financial institution in the ordinary course of business will disclose information to third parties concerning the consumer's account.		
(10) A notice similar to the notice in Appendix A concerning errors or questions about the consumer's electronic transfers.		

Comments & Violations

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WORKPAPER INSTRUCTIONS

REGULATION E, ELECTRONIC FUND TRANSFERS – INITIAL DISCLOSURE

General Instructions

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

Initial Disclosure Review

1. Obtain and review copies of all the initial disclosures. Indicate whether the required Regulation E information is provided.

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ELECTRONIC FUND TRANSFERS – PERIODIC STATEMENT REVIEW					
Bank:		Exam Date:			
Cert#:		EIC:			
Branch:		Prepared by:			
Account #	Customer Name	Statement Date	Type of Activity	Correct Disc.	Comments & Violations

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WORKPAPER INSTRUCTIONS

REGULATION E, ELECTRONIC FUND TRANSFERS – PERIODIC STATEMENT REVIEW

General Instructions

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

Periodic Statement Review

NOTE: Document only those periodic statements that contain violations or issues worthy of comment.

1. Enter the following data:
 - a) Account number
 - b) Customer's name
 - c) Periodic statement date
 - d) Type of EFTA activity shown on statement, for example, direct deposit, ATM withdrawal, etc.
2. Indicate whether the periodic statement disclosures meet the requirements of Section 205.9(b).

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ELECTRONIC FUND TRANSFERS – ERROR RESOLUTION							
Bank:		Exam Date:			Cert #:		
Branch:		EIC:			Prepared by:		
Customer Name	Account #	Type of Notice	Trans. Date	Notif. Date	Type of Error	Prov. Date	Final Res. Date

Comments and Violations

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WORKPAPER INSTRUCTIONS

REGULATION E, ELECTRONIC FUND TRANSFERS – ERROR RESOLUTION

General Instructions

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

Error Resolution Procedures Section 205.11

NOTE: Document only those customer errors where violations or issues worthy of comments are present.

1. Enter the customer's name and account number(s) involved in the dispute.
2. Indicate the type of notice the bank received, letter, telephone call, etc., from the customer and the date of such notice.
3. Indicate the date of the transaction under investigation.
4. Indicate the type of transaction being disputed, for example, ATM withdrawal, payment of pre-authorized transfer subsequent to a proper stop payment notification.
5. Enter the date of any provisional credit required for investigations which may take up to 45 days (out of state and point of sale disputes, 90 days).
6. Enter the date of final resolution of the dispute.

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TRUTH IN SAVINGS DISCLOSURE WORKPAPER						
Bank:	Exam Date:	Cert#:				
Branch:	EIC:	Prepared by:				
Data:	Section: Types of Accounts:					Comments/Violations
Annual Percentage Yield (2 decimal points)	230.4(b)(1)(i)					
Interest Rate	230.4(b)(1)(i)					
Variable Rate: APY can change	230.4(b)(1)(ii)(A)					
How Interest Rate Is Determined	230.4(b)(1)(ii)(B)					
Frequency of Changes	230.4(b)(1)(ii)(C)					
Limits on Changes	230.4(b)(1)(ii)(D)					
Frequency of Compounding (D,M,Q,A,none)	230.4(b)(2)(i)					
Frequency of Interest Crediting (D,M,Q,A)	230.4(b)(2)(i)					
Receive Interest If Account Is Closed	230.4(b)(2)(ii)					
Minimum Balances To:	230.4(b)(3)(i)					
Open Account	230.4(b)(3)(i)(A)					
Avoid Fees	230.4(b)(3)(i)(B)					
Obtain APY	230.4(b)(3)(i)(C)					
Balance Comp. Method (Daily/Average Daily)	230.4(b)(3)(ii)					
When Interest Begins To Accrue	230.4(b)(3)(iii)					
Type & Amount of Fees	230.4(b)(4)					
Conditions for Fee Imposition						
Transaction Limitations	230.4(b)(5)					
Time Accounts:						
Maturity Date	230.4(b)(6)(i)					
Withdrawal Penalty (How Calc)	230.4(b)(6)(ii)					
Statement About Withdrawal of Interest Prior to Maturity						
Reduces Interest 230.4(b)(6)(iii)						
Renewal Policy	230.6(b)(6)(iv)					
Bonuses(Amt.,Type,Time req.,when provided,etc.)	230.4(b)(6)					
Periodic Statements:						
APY Earned (2 decimal)	230.6(a)(1)					
Dollar Amount of Interest	230.6(a)(2) & 230.7					
Dollar Amount of Fees (Agrees to Init. Disc.?)	230.6(a)(3)					
Number of Days Beginning/End of Period	230.6(a)(4)					
Special Rule for Average Daily Balance	230.6(b)					
Subsequent Disclosures:						
Changes in Terms Notice (30 days prior)	230.5(a)(1) & (2)					
Notice Before Maturity	230.4(b), (b)(2) and (c)					

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REGULATION DD, TRUTH IN SAVINGS

WORKPAPER INSTRUCTIONS

Disclosure Workpaper

1. Enter the type of account disclosure reviewed, for example, regular savings, Christmas club, etc.
2. Indicate, where applicable, that disclosures were made in accordance with regulatory requirements. Regulatory sections are provided for reference.

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TRUTH IN SAVINGS PERIODIC STATEMENT WORKPAPER

Bank:

Branch

Exam Date:

EIC:

Cert#:

Prepared by:

Name /

Account

Type

APY Disc/

APY Calc

Int Disc/

Int Calc

Fees

Calc

Method

Comments & Violations

[illegible]

Note: It is assumed that the examiner will verify the total number of days in the statement periods, balances on which interest is calculated, determination of minimum balances to earn interest, compounding and crediting policies, and the dates interest begins to accrue when calculating the APY for the accounts (Section 230.6(a)(4) and 230.7).

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REGULATION DD, TRUTH IN SAVINGS – PERIODIC STATEMENT

WORKPAPER INSTRUCTIONS

General Instructions

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of individual who actually completes the workpaper

Periodic Statement Workpaper

1. Enter customer's name and account number.
2. Enter the type of account for each periodic statement reviewed.
3. Enter the Annual Percentage Yield (APY) disclosed in the statement and the APY calculated by the examiner with the OCC's APY program.
4. Enter the amount of interest disclosed in the statement and the amount of interest calculated by the examiner with the OCC's APY program.
5. Enter the amount of fees detailed in the statement. These fees should be compared to published fees and any exceptions reconciled or cited for apparent violations.
6. Indicate the method of calculating interest. The method should be compared to what has been disclosed for that type of account and any exceptions reconciled or cited for apparent violations.

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PART 329 – MONEY MARKET DEPOSIT ACCOUNTS AND SAVINGS ACCOUNTS

Bank:

Exam Date:

Cert#:

EIC:

Branch:

Prepared by:

		Withdrawals/Transfers						Comments & Violations
Account #	Account Name	1	2	3	4	5	6	

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WORKPAPER INSTRUCTIONS

PART 329 – INTEREST ON DEPOSITS – MMDA AND OTHER SAVINGS ACCOUNTS

General Instructions:

1. Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."
2. Use the Comments and Violations Section:
 - For apparent violations (for example, subsequent disclosures were not provided, etc.)
 - Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

3. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

Money Market Deposit and Savings Accounts (MMDA)

1. Enter the account numbers and names for the accounts reviewed.
2. Indicate the number of restricted withdrawals for each account in the six month period reviewed. (See Section 329.101 for further information on allowable withdrawals for nondemand deposit accounts.)
3. In the comments, discuss whether the number of listed withdrawals/transfers include all withdrawals/transfers or only those for which limits exist.

NOTE: Document only those accounts which have been selected for further review.

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PART 329 – NOW ACCOUNT ELIGIBILITY				
Bank:		Exam Date:		
Cert#:		EIC:		
Branch:		Prepared by:		
Account Owner's Name	Account #	Business Type	Date Open	Comments & Violations

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WORKPAPER INSTRUCTIONS

PART 329 – INTEREST ON DEPOSITS – NOW ACCOUNTS

General Instructions:

1. Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."
2. Use the Comments and Violations Section:
 - For apparent violations (for example, subsequent disclosures were not provided, etc.)
 - Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

3. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

NOW Account Eligibility Workpaper

NOTE: Document only those accounts which have been selected for further review.

1. Enter the following data for the NOW accounts reviewed:
 - a) Account Owner's name
 - b) Account number
 - c) Type of business/organization of the account holder if other than individual
 - d) Date the account was opened according to the applicable signature card

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EXPEDITED FUNDS AVAILABILITY – HOLD NOTICES					
Bank:		Exam Date:			
Cert #:		EIC:			
Branch:		Prepared by:			
Data	1	2	3	4	5
Name					
Account #					
Check Type					
Next Day					
Deposit Amount					
Amount Held					
Deposit Date					
Notice Date					
Reason For Hold or Case by Case					
Disclosed # Days					
Actual Days Held					
\$100 Given Y/N					

Comments and Violations

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WORKPAPER INSTRUCTIONS

REGULATION CC, EXPEDITED FUNDS AVAILABILITY – HOLD NOTICES

General Instructions

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-charge
 - Name of the individual who actually completes the workpaper

Expedited Funds Availability Workpaper – Hold Notices

NOTE: Document only those instances where violations or issues worthy of comment are present

1. Enter the name on the account.
2. Enter the account number.
3. Check Type – indicate whether the check is local or nonlocal under "Check Type."
4. Indicate whether the check is subject to next-day availability.
5. Enter the amount of the deposit.
6. Enter the amount of the deposit the bank is holding.
7. Enter the date of the deposit.
8. Enter the date of the hold notice.
9. Indicate the reason for the hold or whether it is a case-by-case hold. (Reference: Section 229.13 and 229.16(c))
10. Enter the number of days disclosed on the delayed availability notice.
11. Indicate the actual number of days the deposit is held by the bank.
12. Indicate whether the first \$100 is available on the next business day after the day of the deposit.

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EXPEDITED FUNDS AVAILABILITY – INITIAL DISCLOSURES		
Bank:	Exam Date:	
Cert#:	EIC:	
Branch:	Prepared by:	
Regulation CC - Section 229.17 - Initial Disclosures:		
New Accounts - Before opening an account, a bank shall provide a potential customer with the applicable specific availability policy disclosure described in Section 229.16.		
Regulation CC - Section 229.16 - Specific Availability Policy Disclosure	YES	NO
(a) Does the bank provide a general disclosure in writing which includes when funds deposited in an account will be available for withdrawal and information regarding longer delays as required by Section 229.13?		
(b) Content of specific availability policy disclosure - Are the following disclosures provided?		
(1) Summary of availability policy.		
(2) Description of any categories of deposits or checks used by the bank when it delays availability; how to determine the category the deposit belongs in; and when each will be available for withdrawal.		
(3) Description of any of the exceptions in Section 229.13 that may be invoked by the bank.		
(4) A description, as specified in Section 229.16(c)(1), of any case-by-case policy of delaying availability, that may result in funds being available for withdrawal later than the time periods stated in the bank's availability policy.		
(5) A description of how a customer may differentiate between a proprietary/non-proprietary ATM.		
(c) Longer delays on a case-by-case basis.		
(1) Notice in specific policy disclosure.		
(i) Statement that the time when deposited funds are available for withdrawal may be extended.		
(ii) A statement that the bank will notify the customer if funds deposited will not be available for withdrawal until later than the time periods stated.		
(iii) A statement that customers should ask, if they need to be sure, about when a particular deposit will be available for withdrawal.		

Comments & Violations

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WORKPAPER INSTRUCTIONS

REGULATION CC, EXPEDITED FUNDS AVAILABILITY – INITIAL DISCLOSURES

General Instructions

10. Enter the financial institution's:

- Name
- Cert. #
- Branch
- Examination date
- Examiner-in-Charge
- Name of the individual who actually completes the workpaper

Initial Disclosure Workpaper

Obtain and review copies of initial disclosures provided to customer(s) when opening accounts. Indicate whether the required disclosures are provided.

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RIGHT TO FINANCIAL PRIVACY

Bank:

Exam Date:

Cert#:

EIC:

Branch:

Prepared by:

Customer	Accounts Involved	Government Authority	Cust. Auth.	Agency Cert.	Comments & Violations

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WORKPAPER INSTRUCTIONS

RIGHT TO FINANCIAL PRIVACY

General Instructions

1. Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."
2. Use the Comments and Violations Section:
 - For apparent violations (for example, subsequent disclosures were not provided, etc.)
 - Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

Right to Financial Privacy Worksheet

NOTE: Document only those instances where violations or issues worthy of comment are present.

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper
2. Enter the name of the customer.
3. Enter the types of accounts involved in the Federal government request, for example, loan, deposit, etc.
4. Identify the Federal government authority involved in the request.
5. Identify whether financial information was given out by customer authorization and the bank maintains the required information for customer review when allowed.
6. Indicate whether the financial institution had proper written certification from Federal government authorities prior to releasing financial information.

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ADVERTISING	
Bank:	Exam Date:
Cert#:	EIC:
Branch:	Prepared by:

TYPES AND FREQUENCY OF ADVERTISING REVIEWED

Period Reviewed: _____ to _____

	PRINT	RADIO	TV	BROCHURE	SIGNS	ON-LINE BANKING	OTHER
Deposits							
Consumer Loans							
Residential Mtgs							
Commercial Loans							
Banking Services							
Special Services							
Other							

Names of print media:

Names of TV/Radio media:

Comments & Violations:

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WORKPAPER INSTRUCTIONS

ADVERTISING – TYPES AND FREQUENCY

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

2. After review of the advertising file, indicate how many advertisements were done for each bank service/deposit/loan area and then total them by type of media used. Indicate names of print and TV/radio media used separately. Include comments on the circulation for the print media and the audience covered by the radio and television media. Until July 1, 1997, this information will assist the examiner in the CRA Evaluation under Assessment Factor B for large banks.

3. For the table "Types and Frequency of Advertising Reviewed" the types of media are:
 - Print – newspapers, magazines, or catalogs
 - Brochures – brochures, direct mail literature, or pamphlets
 - Signs – exterior signs, billboards or displays
 - Radio
 - Television
 - On-line banking – electronic media

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ADVERTISEMENT COMPLIANCE	
Bank:	Exam Date:
Cert#:	EIC:
Branch:	Prepared by:
Comments & Violations	
FDIC Membership:	
Official Advertising Statement or reproduction of "symbol"	
Non-English equivalent of official advertising statement	
Truth in Savings:	
The advertisement shall not be misleading, use the term "free" if any maintenance or activity fee may be imposed, or use "profit" referring to interest	
Rate of return is stated as "annual percentage yield" ("APY") (Interest rate, if stated cannot be more conspicuous than APY)	
If APY stated, the advertisement should include additional information where applicable	
If bonus is offered, the advertisement should include additional information where applicable	
Fair Housing:	
Home loan advertisements prominently indicate the bank does not discriminate on a prohibited basis	
Equal Housing Lender logo and legend for written visual advertisement	
Oral advertisement – "Equal Housing Lender"	
Truth In Lending – Open End:	
If triggering terms are stated, the advertisement should include additional required information where applicable	
Catalogs and multiple page advertisements meet requirements	
Home equity advertisements include required additional information	
Truth In Lending – Closed End:	
Rate of finance charge stated as APR and the possibility of an increase in APR after consummation is disclosed	
If triggering terms are stated, the advertisement should include additional required information where applicable	
Catalog and multiple page advertisements meet requirements	
Consumer Leasing:	
The advertisement discloses information which agrees with what the lessor usually and customarily leases or will lease such property at those amounts or terms	
Catalog and multiple page advertisements meet requirements	
If triggering terms are stated, additional terms are given where applicable	

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WORKPAPER INSTRUCTIONS

ADVERTISING – ADVERTISEMENT COMPLIANCE

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper

2. Review the advertising file, or a sampling of it. Indicate number of apparent violations of applicable regulations.

Detail specific information on these apparent violations under Comments and Violations. Attach additional sheets as necessary.

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BRANCH/OFFICE VISIT WORKSHEET

Bank:

Exam Date:

Cert#:

EIC:

Main Office:

Prepared by:

Office:				
Date:				
LOBBY SIGNS/DISCLOSURES				
Community Reinvestment				
CRA Notice in the lobby of large banks (345.6 and 345.44)				
CRA Notice in the lobby of small banks (345.44)				
CRA Statement readily available for public inspection in large banks (345.4(e))				
Copies of CRA Statement are available to the public upon request for large banks (345.4(f))				
CRA Statements for large banks are available for public inspection where applicable (345.5)				
Public file is available for public inspection for small banks (345.43) and large banks (345.5 until 7/1/97)				
The bank imposes reasonable fees for copying or mailing the CRA Statement for large banks (345.4(f))				
Fair Housing/Equal Credit Opportunity				
Fair Housing Lender poster conspicuously displayed in public lobby, and where deposits are received or home loans made (338.4(a))				
Equal Housing Lender Poster is 11 x 14 inches (338.4(b))				
If applicable, acceptable Spanish version of poster is displayed (338 Q&A #5)				
Words, phrases, symbols and visual aids do not convey overt or tacit discriminatory preferences or limitations for residential real estate lending (Fair Housing 109.20)				
Truth in Lending				
Required disclosures are on indoor signs if there are "triggering" terms (22616(b)) and (226.24(c))				

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Office:				
Date:				
LOBBY SIGNS/DISCLOSURES (continued)				
Electronic Fund Transfers Consumers received applicable written disclosures prior to the first EFT transaction or when the service is contracted (205.7(a))				
Advertisement of Membership FDIC sign displayed at each station or window where deposits are usually received (328.2(a))				
Expedited Funds Availability Funds availability policy is given to anyone who requests it (229.18(d))				
Funds availability disclosure is given to customer before an account is open (229.17(a))				
A notice of funds availability is located in a conspicuous place where employees receive deposits (229.18(b))				
A notice of funds availability is at each ATM location where funds are deposited (229.18(c))				
The customer is given or informed about the special deposit slip for certain deposits for next business day availability (229.10(c)(3))				
Truth in Savings Account disclosures are given prior to an account being opened or service rendered (230.4(a)(1))				
Account disclosures are provided upon consumer request (230.4(a)(2)(i))				
Indoor signs state "APY" or annual percentage yield (230.8)				
Required disclosures are made if "APY" is Disclosed on indoor sign				
Home Mortgage Disclosure Act The required notice is in each home office and branch located in an MSA (203.5(e))				

Comments & Violations:

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WORKPAPER INSTRUCTIONS

BRANCH/OFFICE VISITS

General Instructions

1. Enter requested information on worksheet(s). If information is not available or disclosure is not applicable, enter "N/A."
2. Use the Comments and Violations Section:
 - For apparent violations (for example, subsequent disclosures were not provided, etc.)
 - Any issues requiring additional comments or review/follow-up

Clearly state violations. Highlight or mark in red for easy reference.

Branch/Office Visits Worksheet

1. Enter the financial institution's:
 - Name
 - Cert. #
 - Branch
 - Examination date
 - Examiner-in-Charge
 - Name of the individual who actually completes the workpaper
2. Enter the name of the financial institution office visited and the date of the visit.
3. Indicate whether the bank office is in compliance with the regulatory requirements for lobby signs and mandatory public notices. Any apparent violation would be explained under Comments/Violations.
4. For large financial institutions that opt to begin displaying the CRA Notice contained in 345.44 prior to July 1, 1997, do not cite as a violation.

NOTE: Indicate any other concerns noted during the visit, for example, training weaknesses, possible unlawful comments to customers/loan applicants, etc. Determine if such issues should be addressed under a specific regulation or instead as a comment with respect to general compliance program.

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COMPLIANCE EXAMINATION HOURS																	
Bank:									Exam Date:								
Cert#:									Examiner:								
DATE																TOTAL	
TIL																	
CL																	
FCR																	
RESPA																	
FI																	
TIS																	
PART 329																	
FDCP																	
PCCD																	
EFT																	
ECOA																	
FH																	
HMDA																	
CRA																	
EFA																	
CPR																	
RFP																	
PART 328																	
OTHER																	
TRAINING																	
PEP-CRA																	
PEP-FL																	
PEP-OTHER																	
PEP-TASK																	
MTGS																	
REP-ON SITE																	
REP-OFF SITE																	
EA-ON SITE																	
EA- OFF SITE																	
CC-ON SITE																	
CC-OFF SITE																	
TOTAL HRS																	

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WORKPAPER INSTRUCTIONS

COMPLIANCE EXAMINATION HOURS

To track and reconcile examination hours to the data entry form, each examiner assigned a compliance examination should complete this workpaper. Fill in the hours on a daily basis to best collect the time spent on assigned tasks. Loan file review hours will be a "best estimate" per regulation. The final workpapers should substantiate the entries on the data entry sheet submitted with the examination report. The Compliance Examination Hours Workpapers also identify the individuals who worked on a particular task in the event subsequent questions should arise.

The task/activity abbreviations on the attached workpaper that do not refer to specific consumer laws and regulations are defined below. *NOTE: On the data entry form, some of these activities are divided between those conducted on and off site.*

Enter the following:

- Name of financial institution
- Cert. #
- Examination date
- Examiner's Name
- Examiner's Grade level

OTHER	-	To capture hours spent on other tasks or regulations not shown
TRAINING	-	Examiner training hours for both "trainer" and "trainee"
PEP	-	Pre-Examination Planning (Off-Site)
- CRA	-	Review of the Community Reinvestment Act
- FL	-	Review of the fair lending regulations, other than the Community Reinvestment Act (Specifically, the Fair Housing Act, the Equal Credit Opportunity Act, and the Home Mortgage Disclosure Act)
- OTHER	-	Review of all other regulations, excluding the fair lending regulations
- TASK	-	Review of bank policies and procedures, correspondences, old reports (DCA and S&S), management meetings that occur before the exam begins, review of UBPR, Data Sheets and Memo, etc.
MTGS	-	Meetings with management
REP	-	Report preparation
EA	-	Review of compliance with prior enforcement actions, Recommendations for enforcement actions
CC	-	Community Contact Interviews

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